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September 5, 2024 *VIA ECF* 

The Honorable Valerie Figueredo United States District Court for the Southern District of New York 500 Pearl Street, Courtroom 17A New York, New York 10007

Re: General Electric Co. v. L3Harris Technologies, Inc., Case No. 23-CV-10736 (VSB)(VF) (S.D.N.Y.)

Dear Magistrate Judge Figueredo:

Pursuant to Section 1.e. of this Court's Individual Practices, I write as lead counsel for Plaintiff General Electric Co. ("GE") in the above captioned matter, with the consent of Defendant L3Harris Technologies, Inc ("L3Harris") to request an adjournment of the September 10, 2024 conference regarding the parties' discovery dispute. (Dkt. Nos. 56, 58.)

The main reason for the requested adjournment is because GE's counsel of record have unmovable conflicts with the scheduled hearing date. Specifically, I have two in-person hearings scheduled for September 10 in California. The primary associate on this matter is going to be out-of-office for his nuptials and honeymoon and the other associate assigned to this matter is on parental leave. Another reason supporting an adjournment is that the parties imminently intend to file an additional modification to the discovery schedule based on the Court's availability to oversee a settlement conference in November or December to enable the parties to engage in a meaningful neutral-assisted settlement conversation with the Court without incurring unnecessary additional litigation costs. (Dkt. No. 60.) As a result, an adjournment of the discovery conference would also minimize potentially unnecessary burdens on the Court. This is the first request for an adjournment of the discovery conference.

The parties propose that the conference be re-scheduled to either: (1) September 24, 2024; or (2) the date of the parties' settlement conference with the Court, if the parties are unable to reach a resolution.

The parties thank the Court for its consideration of this matter.

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**MEMO ENDORSED** 

HON. VALERIE FIGUEREDO UNITED STATES MAGISTRATE JUDGE DATED: 9-6-2024

The adjournment requested herein is granted. The conference to address the parties' discovery dispute is rescheduled to <u>Tuesday</u>, <u>September 24</u>, at 10:30 a.m. The Clerk of Court is respectfully directed

to terminate the motion at ECF No. 61.

Respectfully submitted,

## /s/ Gina Durham

Gina Durham (admitted pro hac vice)

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## /s/ William Bergmann

William Bergmann (admitted *pro hac vice*)

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